

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

E.J. a minor, by IRINA MAYMAN,
mother

Plaintiff

v.

ROBERT JOHNSON et al.,

Defendants

NO. 3:23-cv-1636

(MEHALCHICK, M.J.)

ORDER

AND NOW, this _____ day of _____, 2024, upon consideration of Defendant's Uncontested Motion to Modify Case Management Order (Doc. 19) and for good cause having been shown, IT IS HEREBY ORDERED, that the Defendant's motion is GRANTED and that:

1. Amendment of Pleadings for Plaintiffs shall be completed by July 30, 2024;
2. Amendment of Pleadings for Defendants shall be completed by August 30, 2024.
3. Fact Discovery shall be completed by September 30, 2024;
4. Plaintiff's expert reports shall be completed and served upon Defendants by July 30, 2024;
5. Defendants' expert report shall be completed and served upon plaintiff by September 12, 2024;
6. Supplemental Expert Reports shall be completed and served by October 13, 2024;
7. All dispositive motions shall be filed by October 30, 2024.

BY THE COURT

J.

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

E.J. a minor, by IRINA MAYMAN,
mother

Plaintiff

v.

ROBERT JOHNSON et al.,

Defendants

NO. 3:23-cv-1636

(MEHALCHICK, M.J.)

JOINT MOTION FOR EXTENSION OF TIME

All parties, through their respective counsel, request the court to enlarge the case management deadlines for the following reasons:

1. The Parties have engaged in discovery but may need additional time if mediation efforts fail.
2. The mediation is scheduled for July 16, 2024.
3. Attorney Gray and Attorney Gieger are hopeful that mediation will be successful but in the abundance of caution, an extension of time will be needed.
4. In the event mediation fails, all parties will need more time to schedule additional depositions and to find additional discovery materials that may be revealed in the depositions.
5. Therefore, the parties are requesting a 90-day extension from the previous case management deadlines.
6. The parties propose the following new case management deadlines:

- i. Amendment of Pleadings for Plaintiffs shall be completed by July 30, 2024;
 - ii. Amendment of Pleadings for Defendants shall be completed by August 30, 2024.
 - iii. Fact Discovery shall be completed by September 30, 2024;
 - iv. Plaintiff's expert reports shall be completed and served upon Defendants by July 30, 2024;
 - v. Defendants' expert report shall be completed and served upon plaintiff by September 12, 2024;
 - vi. Supplemental Expert reports shall be completed and served by October 13, 2024;
 - vii. All dispositive motions shall be filed by October 30, 2024.
7. This extension will not unreasonably delay the ultimate resolution of this case.

WHEREFORE, the parties request that their motion be granted.

Respectfully submitted,

Robin J. Gray
P.O. Box 6874
Wyomissing, PA 19610
(484) 769-5855
(610) 777-1432 (Fax)
Website: robinjgraylaw.com
Email: robin@robinjgraylaw.com

NEWMAN WILLAMS P.C.

BY: 

Daniel F. Dolan

ddolan@newmanwilliams.com

Gerard J. Geiger

ggeiger@newmanwilliams.com

712 Monroe Street

Stroudsburg, PA 18360-0511

Tel. (570) 421-9090, Ext. 241


Attorneys for Defendants

DATED: July 5, 2024

CERTIFICATE OF SERVICE

I hereby certify that, on this date, a copy of this document was served upon each counsel of record via ECF.

NEWMAN|WILLIAMS

By: 
Daniel F. Dolan, Esq.
Attorney I.D. # PA333658

Date: July 5, 2024